

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

FEBRUARY 27 2013  
WILLIAM M. McCOOL, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SOFIA GONZALEZ,

Defendant.

**CR 13 5136 RJB**  
No.

INDICTMENT

The Grand Jury charges that:

**COUNT 1**  
**(Bank Fraud)**

**A. The Scheme and Artifice to Defraud**

1. Beginning at a date unknown, but no later than on or about December 30, 2005, and continuing through on or about March 10, 2008, at Clark County, within the Western District of Washington, and elsewhere, SOFIA GONZALEZ devised a scheme

1 and artifice to defraud IQ Credit Union, a financial institution as defined by Title 18,  
2 United States Code, Section 20; and to obtain moneys, funds, credits, assets, and other  
3 property under the custody and control of IQ Credit Union, by means of materially false  
4 and fraudulent pretenses, representations, and promises.

5 2. The essence of the scheme and artifice to defraud was to obtain funds  
6 belonging to Service Employees International Union Local Union 925 ("SEIU LU 925"),  
7 and under the custody and control of IQ Credit Union, using checks with forged  
8 signatures drawn on the SEIU LU 925 checking account at IQ Credit Union, account  
9 number \*5068. Account number \*5068 had formerly belonged to SEIU LU 9288, which  
10 merged with and became part of SEIU LU 925 in 2006. SOFIA GONZALEZ was a  
11 bookkeeper who had worked for SEIU LU 9288 and then for SEIU LU 925 after the  
12 merger. SOFIA GONZALEZ had been authorized to prepare checks for SEIU LU 9288  
13 but not to sign them. J.L. and C.W. were the authorized signers and users of the \*5068  
14 checking account at IQ Credit Union.

15 3. SOFIA GONZALEZ accomplished the scheme by forging the signatures of  
16 J.L. and C.W. on checks drawn on the SEIU LU 925 (formerly LU 9288) checking  
17 account, number \*5068. After forging the signatures of J.L. and C.W., SOFIA  
18 GONZALEZ would make the checks payable to herself, and would deposit the checks  
19 into her checking account at Wells Fargo Bank; or would make the checks payable to her  
20 family member, P.G. SOFIA GONZALEZ did so knowing that she was not entitled to  
21 these funds.

22 **B. Manner and Means of the Scheme and Artifice to Defraud**

23 4. It was part of the scheme and artifice to defraud that SOFIA GONZALEZ  
24 made use of an account at IQ Credit Union, with an account number ending in \*5068,  
25 that formerly belonged to SEIU LU 9288, prior to its 2006 merger with SEIU LU 925.

26 5. It was part of the scheme and artifice to defraud that SOFIA GONZALEZ  
wrote checks to herself drawn on account \*5068.

1           6.     It was part of the scheme and artifice to defraud that SOFIA GONZALEZ  
2 would forge the signatures of J.L. and C.W. on checks that she wrote and made payable  
3 to herself, or to P.G., drawn on account \*5068. The forged signatures were materially  
4 false and fraudulent pretenses, representations, and promises regarding the legitimacy of  
5 the checks.

6           7.     It was further part of the scheme and artifice to defraud that SOFIA  
7 GONZALEZ, for the purpose of executing the scheme, would deposit the checks with the  
8 forged signatures into her account at Wells Fargo Bank, or would allow P.G. to deposit  
9 checks made out to P.G.

10          8.     It was further part of the scheme and artifice to defraud that SOFIA  
11 GONZALEZ and P.G. would make use of the funds that they obtained through the  
12 checks bearing forged signatures, thereby exposing IQ Credit Union, a financial  
13 institution as defined by Title 18, United States Code, Section 20, and SEIU LU 925 to  
14 loss and a risk of loss.

15          9.     It was further part of the scheme and artifice to defraud that SOFIA  
16 GONZALEZ and P.G., using the checks bearing forged signatures, obtained not less than  
17 \$40,087.49 in fraudulent proceeds.

18 **C.     Execution of the Scheme and Artifice to Defraud**

19          11.    On or about the below-listed date, at Clark County, within the Western  
20 District of Washington, and elsewhere, SOFIA GONZALEZ did knowingly and willfully  
21 conduct the below listed transaction, involving a check with the forged signatures of J.L.  
22 and C.W., for the purpose of executing this scheme and artifice to defraud IQ Credit  
23 Union, and to obtain moneys, funds, credits, assets, and other property under the custody  
24 and control of IQ Credit Union, by means of materially false and fraudulent pretenses,  
25 representations, and promises; this transaction being a representative example of the  
26 transactions conducted pursuant to this scheme and artifice to defraud:

Check Date	Transaction Date	Check Number	Amount	Payee
Feb. 25, 2008	March 10, 2008	10898	\$910.20	Sofia S. Gonzalez

All in violation of Title 18, United States Code, Section 1344 and Section 2.

## **COUNT 2**

### **(Embezzlement of Labor Union Assets)**

12. On or about March 10, 2008, at Clark County, within the Western District of Washington, and elsewhere, the defendant, SOFIA GONZALEZ, while an employee of SEIU LU 925, a labor organization engaged in an industry affecting commerce, did embezzle, steal, and unlawfully and willfully abstract and convert to her own use the moneys, funds, and assets of said labor organization, in the approximate amount of \$910.20.

All in violation of Title 29, United States Code, Section 501(c).

## **ALLEGATION OF FORFEITURE**

13. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures to the United States of America pursuant to Title 18, United States Code, Section 982(a)(2).

14. Upon conviction of the offense(s) alleged in Count 1 of this Indictment, in violation of Title 18, United States Code, Section 1344, the defendant, SOFIA GONZALEZ, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense(s). The property to be forfeited includes, but is not limited to, the following:

- 1 (a) A money judgment of forfeiture in the amount of \$40,087.49,  
2 representing the proceeds of the offense.

3 15. The allegations contained in Count 2 of this Indictment are hereby  
4 realleged and incorporated by reference for the purpose of alleging forfeitures to the  
5 United States of America pursuant to Title 18, United States Code, Section 981(a)(1)(C)  
6 and Title 28, United States Code, Section 2461(c).

7 16. Upon conviction of the offense in violation of Title 29, United States Code,  
8 Section 501(c) set forth in Count 2 of this Indictment, the defendant, SOFIA  
9 GONZALEZ, shall forfeit to the United States, pursuant to Title 18, United States Code,  
10 Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property,  
11 real or personal, which constitutes or is derived from proceeds traceable to the offense.  
12 The property to be forfeited includes, but is not limited to, the following:

- 13 (a) A money judgment of forfeiture in the amount of \$910.20,  
14 representing the proceeds of the offense.

15 17. If any forfeitable property, as a result of any act or omission of the  
16 defendant—

- 17 (a) cannot be located upon the exercise of due diligence;  
18 (b) has been transferred or sold to, or deposited with, a third party;  
19 (c) has been placed beyond the jurisdiction of the court;  
20 (d) has been substantially diminished in value; or,  
21 (e) has been commingled with other property which cannot be divided without  
22 difficulty;

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1 the United States of America shall be entitled to forfeiture of substitute property pursuant  
2 to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States  
3 Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

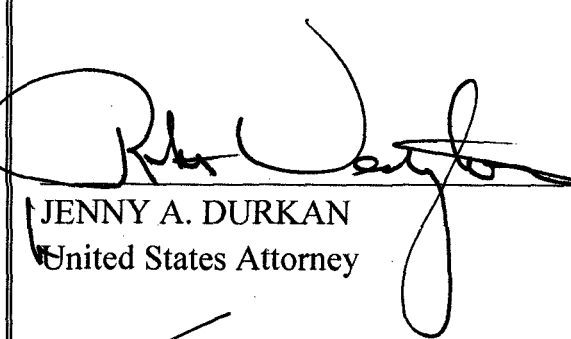
4 All pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2), and 28 U.S.C. § 2461(c).

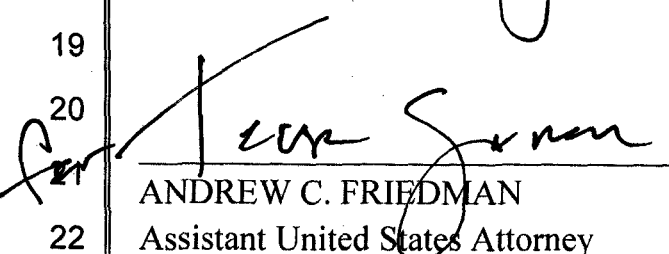
5  
6 A TRUE BILL:


7 DATED: 2-27-13  
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11 *Signature of Foreperson redacted pursuant to*  
12 *the policy of the Judicial Conference of the*  
13 *United States*

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FOREPERSON

  
JENNY A. DURKAN  
United States Attorney

  
ANDREW C. FRIEDMAN  
Assistant United States Attorney

  
DARWIN P. ROBERTS  
Assistant United States Attorney